FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Tribune Company

Attn: Michael Riley

435 North Michigan Avenue Chicago, Illinois 60611

<u>Application No.</u>: 74030087 <u>I.D. No.</u>: 031600COL

Applicant's Designation: Date Received: July 5, 2005

Subject: Boilers, Generators, and Tanks

Date Issued: Expiration Date:

Location: 435 North Michigan Avenue, Chicago, 60611

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three 27.5 mmBtu/hour natural gas/#6 oil fired boilers, one 1750 Kw #2 fuel oil fired emergency generator, one 150 Kw natural gas fired emergency generator, two 25,300 gallon #6 fuel oil storage tanks, and 3,700 gallon #2 fuel oil storage tank, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of carbon monoxide, sulfur dioxide and nitrogen oxides from the source to less than the levels at which the source would be a major source, as further described in Attachment A. As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes the current permit(s) issued for this location.
- 2. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 Ill. Adm. Code 216.121.
- 3. Emissions and operation of the 3 boilers shall not exceed the following limits:
 - a. Natural Gas Usage: 30 mmscf/month 150 mmscf/year

	Emission Factor	Emissions		
<u>Pollutant</u>	(Lb/1,000 scf)	(Tons/Mo)	(Tons/Yr)	
NO_x	100	1.500	7.50	
CO	84	1.260	6.30	
MOV	5.5	0.082	0.41	
SO_2	0.6	0.010	0.05	
PM	7.6	0.114	0.57	

These limits are based on the maximum fuel usage and standard emission factors AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

b. #6 Fuel Oil Usage: 180,000 gallons/month 300,000 gallons/year

	Emission Factor	Emissions		
<u>Pollutant</u>	(Lb/1,000 Gal)	(Tons/Mo)	(Tons/Yr)	
NO_x	55.0	4.95	8.25	
CO	5.0	0.45	0.75	
VOM	1.6	0.02	0.03	
SO_2	41.1	4.24	7.06	
PM	10.0	0.90	1.50	

These limits are based on the maximum fuel usage and standard emission factors AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

- 4. Emissions and operation of the 2 generators shall not exceed the following limits:
 - a. Natural Gas Usage: 120,000 scf/month 120,000 scf/year

	Emission Factor	Emissions		
Pollutant	$(Lb/10^6 scf)$	(Tons/Mo)	(Tons/Yr)	
NO_x	3 , 170	0.19	0.19	
CO	386	0.03	0.03	
VOM	1,640	0.10	0.10	
SO_2				
PM				

These limits are based on the maximum fuel usage and standard emission factors AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

b. #2 Fuel Oil Usage: 11,500 gallons/month 11,500 gallons/year

	Emission Factor	Emissions		
Pollutant	(Lb/1,000 scf)	(Tons/Mo)	(Tons/Yr)	
NO_x	448.0	2.58	2.58	
CO	119.0	0.43	0.43	
VOM	12.6	0.16	0.16	
SO_2	42.4	0.13	0.13	
PM	9.8	0.14	0.14	

These limits are based on the maximum fuel usage and standard emission factors AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

- 5a. Within 30 days of a written request from the Agency the Permittee shall submit data on the sulfur content by weight of representative #6 and/or #2 fuel oil, determined by laboratory analysis.
- b. The submitted data shall include the sulfur content by weight of the #6 and/or #2 fuel oil, a justification of why this is representative, and a description of the sampling procedures and documentation for the analysis.
- c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
- 6a. The Permittee shall not utilize fuel oil (Grades No. 2 and 6) in the boilers and generator with a sulfur content greater than the larger of the following two values:
 - i. 0.28 weight percent, or
 - ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
- b. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources.
- c. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 7. This permit is issued based on negligible emissions of volatile organic material from the 3 storage tanks. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr from each storage tank.
- 8a. The Permittee shall maintain monthly records of the following items:
 - i. Natural gas usage (mmscf/month and mmscf/year);
 - ii. #6 fuel oil usage (gallons/month and gallons/year);
 - iii. #2 fuel oil usage (gallons/month and gallons/year);
 - iv. Sulfur content (weight %) of both #6 fuel oil and #2 fuel oil; and
 - v. SO_2 and NO_x emissions as calculated by AP-42 emission factors and the actual natural gas, #6 fuel oil, and #2 fuel oil usage (lbs/month and lbs/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

Telephone: 217/782-5811 Fax: 217/782-6348

 $\underline{\text{and}}$ one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

Telephone: 847/294-4000

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:GMK:psj

cc: Region 1

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons/year NO_x , CO, SO_2 , and volatile organic material at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

				S S I (Tons/Year	ONS	
Emissions Unit	<u>Fuel</u>	\underline{NO}_{x}	<u>CO</u>	$\frac{SO_2}{SO_2}$	<u>РМ</u>	<u>VOM</u>
3 Boilers	Natural Gas #6 Oil	7.50 8.25	6.30 0.75	0.05 7.06	0.57 1.50	0.41
1 Generator	Natural Gas #2 Oil	0.19 2.58	0.03 0.43	0.13	0.14	0.10 0.16
2 #6 Oil Storage Tanks	# 6 Oil					0.88
1 #2 Oil Storage Tank Total	#2 Oil	18.52	7.51	7.24	2.21	$\frac{0.44}{2.02}$

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